

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 1997

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Docket No. R97-1

**FIRST SET OF INTERROGATORIES OF THE ADVERTISING MAIL
MARKETING ASSOCIATION TO USPS WITNESS BARON
(AMMA/USPS-LR-H-113-1-5)**

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Advertising Mail Marketing Association hereby propounds the attached interrogatories and requests for the production of documents. The instructions contained in our interrogatories to Witness Moeller (AMMA/USPS-T-36-1-3) are incorporated by reference.

If you are unable to provide any of the requested documents or information as to any of the interrogatories, please provide an explanation for each instance in which documents or information cannot be or have not been provided. If the witness to whom this request is directed cannot respond, but another witness can, please redirect the request to that witness.

Respectfully submitted,



Ian D. Volner
N. Frank Wiggins
Counsel to Advertising Mail Marketing
Association

AMMA/USPS-LR-H-113-1

The FY1996 study contained in LR-H-113 was based on a sample of 4,817 observations (page 6). Please describe in detail the design and execution of the sampling study including, but not limited to:

- a. The study objectives;
- b. The universe of study;
- c. The frame;
- d. Stratification;
- e. Sample size by stratum;
- f. The assumed standard deviations of the variables and desired reliability of the estimates that were used in determining the sample size(s);
- g. Who designed and carried out the study; and,
- h. The period of time over which the observations were taken.

AMMA/USPS-LR-H-113-2

For the results of the FY1996 sample that are presented on pages 100-102 of LR-H-113, please provide the following:

- a. Source(s) for the variabilities (Column F);
- b. The number of observations and standard error due to sampling for each line in Columns C through G and J of the table on pages 100-102; and,
- c. Explain any "non-sampling" errors that may occur in these estimates and not be reflected in the standard errors stated in part b (e.g., accounting errors in population totals and differences in time periods).

AMMA/USPS-LR-H-113-3

The "RBCS Keying Productivity" reported on page 10 of LR-H-113 was revised on 08/18/97).

- a. Please confirm that the only difference between the original and the revision of this page was the change of time period from FY96Q4 to FY96 Annual;
- b. If you cannot confirm part a, please provide a complete explanation of all changes; and,
- c. Please provide the 95% confidence limits on the three estimates (images, hours and productivity) for both the original and the revised pages including the sources for these calculations.

AMMA/USPS-LR-H-113-4

Pages 2 and 5 of LR-H-113 state that the SAS procedure "...PROC UNIVARIATE" is used to analyze the distribution of the productivities and that the highest 1% and the lowest 1% of the sampled productivities were eliminated as outliers.

Please explain why there was an automatic elimination without inspection of the individual extreme observations?

AMMA/USPS-LR-H-113-5

USPS Witness Daniel (USPS-T-29 at 4 line 11) references USPS LR-H-113 as the source of "non-class specific FY97 MODS barcode sorter accept rates.."

- a. For each parameter estimated in LR-H-113 and used in USPS-T-29 Appendix I pages 40 or 43 or used to derive any values on these pages, please complete the following table with the exact paired references (cross walk) between the source and use of each parameter:

Source: LR-H-113

Use: USPS-T-29 Appendix I

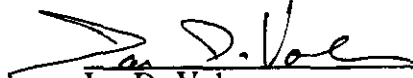
Parameter	Location		Standard	Name	Location (and derivation if derived)
<u>Name</u>	<u>(Page, Line, Column, etc.)</u>	<u>Value</u>	<u>Deviation</u>	<u>(if different)</u>	<u>(Page, Line, Column, etc.)</u>
(1)	(2)	(3)	(4)	(5)	(6)

- b. Please confirm that USPS-T-29 makes "proper" use of the estimates that come from LR-H-113? (By "proper" we mean the proper time period(s) and in a manner consistent with the objective of the sample design and analysis.)
- c. If part b is not confirmed, please explain why you cannot confirm to the use of these estimates.

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served this document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

DATE: October 30, 1997



Ian D. Volner